

## UNITED STATES DISTRICT COURT

for the  
Southern District of TexasUnited States Courts  
Southern District of Texas  
FILED

United States of America

v.

Jimmy Lee FLORES

Case No. C-23-187M

*March 13, 2023*  
Nathan Ochsner, Clerk of Court*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 03/12/2023 in the county of Brooks in the  
Southern District of Texas, the defendant(s) violated:*Code Section*

8 United States Code § 1324

*Offense Description*

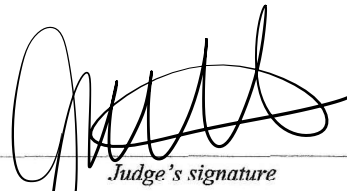
Did knowingly or in a reckless disregard of the fact that an alien had come to, entered, or remained in the United States in violation of law, transport, or move or attempt to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law.

This criminal complaint is based on these facts:

Please see attachment

☒ Continued on the attached sheet.Submitted by electronic means, sworn to,  
signature attested telephonically  
per Fed. R. Crim. P. 4.1 and probable cause found:Date: 03/13/2023City and state: Corpus Christi, Texas*Daniel Bodiford**Complainant's signature*

Daniel Bodiford, Special Agent

*Printed name and title**Judge's signature*

Julie K. Hampton, U.S. Magistrate Judge

*Printed name and title*

## AFFIDAVIT

I, Daniel Bodiford after being duly sworn, state as follows:

On March 12, 2023, U.S. Border Patrol (BP) Agent Isaiah Santos, was performing primary inspection duties at the Falfurrias United States Border Patrol Checkpoint, located in Falfurrias, Texas, on U.S. Highway 281. At approximately 4:10 a.m., a black in color Ford F-250 bearing Texas license plates entered the primary inspection lane. The F-250 was pulling a utility trailer. BP Agent Santos proceeded to conduct an immigration inspection of the driver, later identified as Jimmy Lee FLORES. Upon speaking to FLORES, BP Agent Santos asked FLORES how many occupants were in the vehicle, in which FLORES replied, "Just us two." BP Agent Santos then asked FLORES what he was hauling in the trailer, in which FLORES replied, "It's empty." BP Agent Santos then asked both FLORES and the juvenile passenger as to their citizenship. Both replied they were United States citizens. At this time, BP Agent F. Carriaga along with service canine Barras was performing a free air canine sniff of the utility trailer. BP Agent Carriaga advised BP Agent Santos that service canine Barras alerted to the utility trailer. BP Agent Carriaga then requested BP Agent Santos to send to the secondary inspection area for a further search. Given the facts, BP Agent Santos then referred FLORES to the secondary inspection area for further investigation.

While in the secondary inspection area, BP Agents observed that the trailer was latched closed with no lock on it. Upon further inspection of the trailer, BP Agents discovered a total of thirteen (13) subjects hidden in the trailer. Upon a further immigration inspection of the thirteen (13) subjects, it was later determined all thirteen (13) subjects were illegally present in the United States. At this time, all subjects were escorted into the Falfurrias Border Patrol Checkpoint for processing.

At approximately 5:10 a.m., Border Patrol Agent Edgar U. Castro and K. Krukowski advised FLORES of his Miranda Rights as per form I-214 in his preferred language of English. FLORES waived his rights to have an attorney present and agreed to give a sworn statement. FLORES told agents on March 11, 2023, he was offered \$2,000 USD to smuggle non-citizens

from the Mission, Texas area to Houston, Texas. FLORES told agents the agreement with the unknown individuals was for him to drive a black in color Ford F-250 truck hauling a white utility trailer containing the non-citizens. FLORES told agents he would be paid an additional \$3,000 USD once the non-citizens made it to Houston, Texas from Mission, Texas. FLORES also told agents a gray in color Volkswagen Jetta would be guiding him to the unknown location in Houston, Texas.

On March 12, 2023, Border Patrol agents advised Wilfredo Alonso MEJIA-Cruz, a native citizen of El Salvador, of his Miranda Rights as per form I-214 in his preferred language of Spanish. MEJIA-Cruz waived his rights to have an attorney present and agreed to give a sworn statement. MEJIA-Cruz told agents he entered the United States by crossing the river from Reynosa, Mexico to Hidalgo, Texas. Once he crossed into the United States, MEJIA-Cruz said he was taken to a hotel where he paid to stay the night. MEJIA-Cruz then stated he was taken to a two-story house where the trailer was parked. MEJIA-Cruz was shown a photo line-up of the driver but was unable to make a positive identification.

On March 12, 2023, Border Patrol agents advised Jose Roberto NAVARRETE-Gonzalez, a native citizen of El Salvador, of his Miranda Rights as per form I-214 in his preferred language of Spanish. NAVARRETE-Gonzalez stated he understood his rights and was not willing to give a statement at this time.

SA Bodiford reviewed all the paperwork received from Border Patrol in this case, and none of the other 11 individuals could provide any exculpatory statements or evidence. They were processed accordingly to be sent back to their native countries.

On March 12, 2023, Assistant United States Attorney Lance Watt accepted prosecution of Jimmy Lee FLORES for violation of Title 8 USC 1324, Alien Smuggling.

Wilfredo Alonso MEJIA-Cruz and Jose Roberto Navarrete- GONZALEZ will be held as material witnesses pending criminal proceedings.

Falfurrias Border Patrol agents contacted and released the juvenile passenger into the custody of her parents.

Daniel Bodiford

Special Agent Daniel Bodiford  
Homeland Security Investigations

Submitted by electronic means, sworn to, signature  
attested telephonically per Fed. R. Crim. P. 4.1, and  
probable cause found on this day March 13th, 2023:

  
\_\_\_\_\_  
Julie K. Hampton, U.S. Magistrate Judge